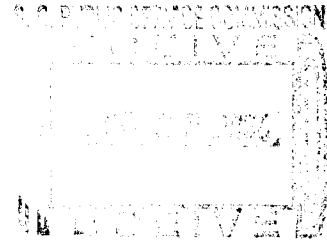


John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com

February 2, 2006

VIA ELECTRONIC AND FIRST CLASS MAIL SERVICE

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211



RE: BellSouth Telecommunications Complaint and Request for
Summary Disposition Against NewSouth Communications Corp.
Docket No. 2004-63-C, Our File No. 812-10227

Dear Mr. Terreni:

Enclosed is the original and ten (10) copies of **NewSouth Communications Corp.'s First Request for Production of Documents to BellSouth Telecommunications, Inc** in the above-referenced docket.


By copy of this letter, I am copying all parties of record with this document and enclose my certificate of service to that effect.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the envelope provided.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,


John J. Pringle, Jr.

JJP/cr

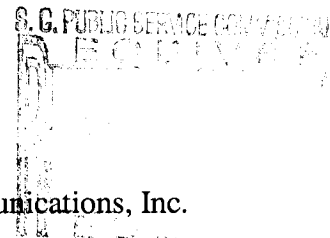
cc: Susan Berlin, Esquire
all parties of record

Enclosures

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2004-63-C

IN RE:)	
)	
BellSouth Telecommunications)	NewSouth Communications Corp.'s First
Complaint and Request for Summary)	Request for Production of Documents to
Disposition Against NewSouth)	BellSouth Telecommunications, Inc.
Communications Corp.)	
)	

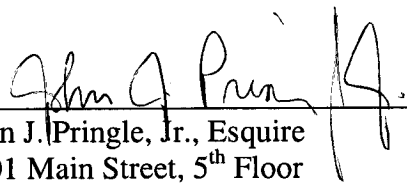


To: Patrick Turner, Esquire, Counsel for BellSouth Telecommunications, Inc.

NewSouth Communications Corp. ("NewSouth") hereby serves its First Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth").

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce copies of BellSouth's responses to the Office of Regulatory Staff's First Continuing Data Request in this docket, together with any and all attachments thereto.



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Attorneys for NewSouth
Telecommunications, Corp.

Columbia, South Carolina
February 2, 2006